

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: BRADLEY J. JACOBS, JR.
BRITTANY DAWN JACOBS**

CHAPTER 13

DEBTORS

CASE NO. 23-10003 JDW

**RESPONSE TO LIBERTY FINANCE COMPANY, INC.'S
MOTION TO PAY ADMINISTRATIVE EXPENSES [DKT. #21]**

COME NOW, Bradley J. Jacobs, Jr. and Brittany Dawn Jacobs, Debtors, by and through their attorney of record, and files this response to the motion filed by Liberty Finance Company, Inc. (“Creditor”), and would respectfully state unto the Court as follows, to-wit:

1. The Debtors admit the allegations contained in Paragraph 1.
2. The Debtors neither admit nor deny the allegations contained in Paragraph 2.
3. The Debtors deny the allegations contained in Paragraph 3 and would state the Creditor should file a Notice of Post-petition Mortgage Fees, Charges and Expense, and only allowed to recover expenses incurred with 180 days prior to date of notice pursuant to Federal Rules of Bankruptcy Procedure, R 3002.1 (c). Debtors deny this claim is an administrative claim and the Creditor has failed to prove otherwise.
9. The Debtors deny the allegations contained in the Paragraph beginning

“WHEREFORE, PREMISES CONSIDERED”, and continuing to the end of the motion.

WHEREFORE, PREMISES CONSIDERED, Debtors request that this Honorable Court will deny the motion filed herein by R. Adam Kirk on behalf of Liberty Finance Company, Inc, (“Creditor”) filed herein and for such other, further and general relief to which the Debtors may be entitled.

Respectfully Submitted, this the 20th day of June, 2023.

/s/Robert H. Lomenick
KAREN B. SCHNELLER, MSB 6558
ROBERT H. LOMENICK, JR., MSB 104186
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CERTIFICATE OF SERVICE

I, Robert H. Lomenick, attorney for Debtor(s), do hereby certify that I have this day forwarded by electronic means or via United States Mail, postage prepaid, of the above and foregoing Response to the following:

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Dated: June 20, 2023

/s/Robert H. Lomenick
ROBERT H. LOMENICK, JR.